

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**COMMENTS OF
SUBURBAN COMMUNITY CHANNELS – WHITE BEAR LAKE, MN**

Suburban Community Channels of White Bear Lake, Minnesota submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.” We are concerned about the preservation of PEG Access as a needed community resource. In these comments we specifically address the role of PEG channels in our community, and the importance of preventing companies from inhibiting access to these channels.

Suburban Community Channels offers public, education, government and community programming on its local PEG channels to residents of the twelve communities in the Northeast suburbs of St. Paul, MN. That programming is of unique local interest and needs to be readily accessible to viewers not placed in a format, which is inferior or less accessible than other channels.

The SCC has one (1) MVPD provider: Comcast Xfinity. Comcast provides PEG channels on all tiers of services and provides Channels 14 and 15, (public access), channel 16, (government access), channels 18, 19, 95 (community programming), and channels 20 and 98 (educational access),

Currently, AT&T does not provide service to residents of the SCC cable franchise area. But, as detailed in that Petition, AT&T’s PEG product is inferior to broadcast channels carried on AT&T’s U-verse system in virtually every way that matters to a viewer. If channels are made less accessible, and are deprived of basic functions viewers have come to expect, many subscribers we now reach will not receive valuable information. It’s unacceptable with the technological advances of the 21st Century that local residents would be deprived of easy access to information about the education of our children, dissemination of health information, facilitation of job placement, and emergency alerts.

We provide an invaluable service in our cable service franchise area. Our local leaders made our work possible by making fair and modest requirements of our cable companies in return for their very profitable use of our local public rights-of-way. This system works and works well for the community and cable company. The FCC goal of competition is being met by the natural actions and work of the commercial industry. We ask that the FCC recognize the value of diverse, local PEG access programs and the need for federal policies that provide the transmission and resources essential to community-based work like ours and that of our colleagues.

PEG channels are a critical and irreplaceable resource for our community. If the FCC fails to prevent the industry practices at issue in the above mentioned petitions, we have little doubt that other operators might also adopt approaches that marginalize or effectively eliminate PEG access. Thank you for your attention to this important matter.

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